

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
GREENVILLE DIVISION**

IN RE:)
)
) **Case No. 19-00730-5-JNC**
CAH ACQUISITION COMPANY #1, LLC d/b/a)
WASHINGTON COUNTY HOSPITAL,) **Chapter 7**
)
)
Debtor.)
)
)

**MOTION TO EMPLOY WALDREP LLP AS COUNSEL
FOR INTERIM TRUSTEE**

Thomas W. Waldrep, Jr., interim trustee in the above-captioned case (the “Interim Trustee”), hereby moves for the entry of an Order pursuant to Section 327(a) of Title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”) and Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) authorizing the employment of Waldrep LLP (“Waldrep LLP” or the “Firm”) as counsel for the Interim Trustee effective as of February 22, 2019. In support of this Motion, the Interim Trustee refers to the *Affidavit of Thomas W. Waldrep, Jr. in Support of the Motion to Employ Waldrep LLP as Counsel for Interim Trustee* (the “Waldrep Affidavit”), attached hereto as **Exhibit A**, and respectfully states as follows:

JURISDICTION AND VENUE

1. This United States Bankruptcy Court for the Eastern District of North Carolina (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, and this matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).
2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.
3. The statutory predicates for the relief requested herein are Section 327(a) of the Bankruptcy Code and Bankruptcy Rule 2014.

FACTUAL BACKGROUND

4. On February 19, 2019 (the “Petition Date”), Washington County, North Carolina, Medline Industries, Inc., and Dr. Robert Venable (collectively, the “Petitioning Creditors”) filed an involuntary petition for relief under Chapter 7 of the Bankruptcy Code against CAH Acquisition Company #1, LLC d/b/a Washington County Hospital (the “Debtor”) [Dkt. No. 1].

5. On February 20, 2019, the Petitioning Creditors filed an *Emergency Motion for Order Appointing Interim Trustee Pursuant to 11 U.S.C. § 303(g)* [Dkt. No. 5].

6. On February 22, 2019, the Court entered an Order approving the appointment of the Interim Trustee [Dkt. No. 14]. The Interim Trustee is the duly appointed, qualified, and acting trustee of the Chapter 7 estate of the Debtor.

7. The Debtor owns Washington County Hospital (“WCH”), a twenty-five-bed, for-profit, Critical Access Hospital (CAH) in Plymouth, North Carolina. Until February 14, 2019, WCH provided acute care, swing bed, emergency medicine, imaging, rehabilitation, laboratory, and related outpatient ancillary services to residents in Plymouth and in surrounding communities. WCH also operates Plymouth Primary Care Rural Health Clinic (the “Clinic”), a Provider-Based Rural Health Clinic (PB-RHC). The Clinic is adjacent to WCH.

RELIEF REQUESTED

8. Pursuant to Section 327(a) of the Bankruptcy Code and Rule 2014 of the Bankruptcy Rules, the Interim Trustee requests that the Court enter an Order: (i) authorizing the employment and retention of Waldrep LLP as counsel for the Interim Trustee in the instant case; (ii) approving the terms of Waldrep LLP’s employment, including the proposed fee structure, set forth in this Motion; and (iii) granting such other and further relief as the Court deems appropriate.

The Interim Trustee requests that Waldrep LLP's employment be deemed effective as of February 22, 2019.

A. Selection of Waldrep LLP

9. The Interim Trustee has selected Waldrep LLP as his counsel because Waldrep LLP has substantial experience in complex Chapter 7 cases. Waldrep LLP has represented many debtors, creditors, purchasers, and other parties-in-interest before this Court, bankruptcy courts elsewhere in North Carolina, and bankruptcy courts in other jurisdictions throughout the southeastern United States. Waldrep LLP has the resources necessary to manage a Chapter 7 case of this size and scope.

10. For the foregoing reasons, the Interim Trustee believes that Waldrep LLP is well qualified to advise and represent the Interim Trustee in this case and has the experience and expertise required to advise and represent the Interim Trustee in an efficient, cost-effective manner.

B. Services to be Rendered

11. The employment of Waldrep LLP is necessary to assist the Interim Trustee in executing faithfully his duties as interim trustee. The professional services to be offered by Waldrep LLP in the case include, but are not limited to, the following:

- a. Legal advice with respect to the Interim Trustee's duties and powers;
- b. Assistance in the administration of the Debtor's estate;
- c. Assistance in the preparation and filing of all necessary reports;
- d. Assistance and advice in the examination of the Debtor's affairs and the causes of insolvency;

e. Assistance and advice regarding communications with outside parties and furnishing of necessary information;

f. Defense of the estate against improper claims;

g. Analysis of proof of claims; and

h. Such other legal services as may be required and in the interest of the estate and the Interim Trustee, including but not limited to the commencement of adversary proceedings as may be authorized and motions to sell.

C. Professional Fees and Expenses

12. Waldrep LLP has agreed to advise the Interim Trustee on an hourly basis at its standard billing rates, plus reimbursement for actual, necessary expenses incurred in the course of the engagement, as may be subsequently allowed and approved in accordance with the Bankruptcy Code. The Interim Trustee anticipates that the following Waldrep LLP attorneys and staff will assist the Interim Trustee in this Chapter 7 case:

Thomas W. Waldrep, Jr. (Partner)	\$620 per hour
Jennifer B. Lyday (Partner)	\$400 per hour
Francisco T. Morales (Partner)	\$350 per hour
Anne H. Phillips (Associate)	\$275 per hour
John R. Van Swearingen (Associate)	\$240 per hour
Yazmeen O. Gadalla (Paralegal)	\$190 per hour

13. The rates set forth above are subject to periodic review and adjustment and are set at a level designed to compensate Waldrep LLP fairly for the work of its attorneys and staff. Waldrep LLP will provide prior notice to the Interim Trustee of any periodic adjustment.

14. Consistent with Waldrep LLP's policy with respect to its other clients, Waldrep LLP will charge the Interim Trustee for services provided and for other charges incurred and disbursements made in the rendition of legal services. These charges and disbursements include, among other things, costs for travel, business meals, messengers, couriers, postage, witness fees,

and other fees related to hearings and other proceedings that may arise from time to time in the case. Charges and disbursements will be invoiced pursuant to Waldrep LLP's terms of engagement and will comply with the United States Bankruptcy Administrator's guidelines for fees and disbursements for bankruptcy professionals in the Eastern District of North Carolina.

15. Waldrep LLP intends to apply to the Court for allowance of compensation for professional services and reimbursement of expenses incurred in this case in accordance with applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, and the Orders and Local Rules of this Court.

16. Waldrep LLP has agreed to accept as compensation such sums as may be allowed by the Court on the basis of the professional time spent, the rates charged for such services, the necessity of such services to the administration of the estate, the reasonableness of the time within which the services were performed in relation to the results achieved, and the complexity, importance, and nature of the problems, issues, or tasks addressed in the case. Waldrep LLP has prepared the affidavit of Thomas W. Waldrep, Jr., the Firm's managing partner, disclosing the information relevant to this Motion pursuant to Bankruptcy Rules 2014 and 2016. The Waldrep Affidavit is attached hereto as **Exhibit A**.

D. Disinterested Professionals

17. Waldrep LLP represents no other entity in connection with this case. Except as may be stated in the Waldrep Affidavit, as the same may be amended or supplemented from time to time, Waldrep LLP neither represents nor holds any interest adverse to the interests of the estate. Waldrep LLP is disinterested as defined in Section 101(14) of the Bankruptcy Code, as modified by Section 1107(b) of the Bankruptcy Code. The Waldrep Affidavit, which is attached hereto as **Exhibit A**, provides further disclosures relevant to this Motion.

CONCLUSION

18. Waldrep LLP can and will provide specific benefits to the Interim Trustee, and its legal services will enhance the administration of this case. The Interim Trustee believes that such services will be in the best interests of all parties involved in this proceeding.

Wherefore, the Interim Trustee respectfully request that the Court enter an Order: (1) approving the employment of Waldrep LLP as counsel for the Interim Trustee in the above-captioned case, effective as of February 22, 2019; and (2) granting such other relief as the Court may deem necessary and proper.

Respectfully submitted, this the 27th day of February, 2019.

WALDREP LLP

/s/ Thomas W. Waldrep, Jr.

Thomas W. Waldrep, Jr. (NC State Bar No. 11135)
Jennifer B. Lyday (NC State Bar No. 39871)
Francisco T. Morales (N.C. State Bar No. 43079)
Anne H. Phillips (NC State Bar No. 48760)
John R. Van Swearingen (NC State Bar No. 53646)
101 S. Stratford Road, Suite 210
Winston-Salem, NC 27104
Telephone: 336-717-1440
Telefax: 336-717-1340
Email: notice@waldrepllp.com

Proposed Attorneys for the Interim Trustee

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
GREENVILLE DIVISION**

IN RE:)
) Case No. 19-00730-5-JNC
CAH ACQUISITION COMPANY #1, LLC d/b/a)
WASHINGTON COUNTY HOSPITAL,) Chapter 7
)
Debtor.)
)

**AFFIDAVIT OF THOMAS W. WALDREP, JR. IN SUPPORT OF MOTION TO
EMPLOY WALDREP LLP AS COUNSEL FOR INTERIM TRUSTEE**

I, Thomas W. Waldrep, Jr., do solemnly depose and declare as follows:

I am the managing partner of Waldrep LLP (“Waldrep LLP” or the “Firm”), a law firm that maintains its office in Winston-Salem, North Carolina. I am admitted to practice before this Court and will assume primary responsibility within the Firm for its engagement in the above-referenced Chapter 7 case.

I am fully familiar with the facts stated herein and submit this affidavit (the “Affidavit”) in support of the *Motion to Employ Waldrep LLP as Counsel for Interim Trustee* (the “Motion”) pursuant to Section 327(a) of the Bankruptcy Code, and Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure.

I am fully familiar with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and the Rules of Practice and Procedure of this Court, and I am sufficiently competent to handle whatever might foreseeably be expected of the Interim Trustee’s counsel in this matter.

To the extent that any information disclosed herein requires amendment or modification upon Waldrep LLP’s receipt of additional information or as additional information becomes available to Waldrep LLP, a supplemental affidavit will be submitted to the Court.

Professional Fees and Expenses

I anticipate that the following Waldrep LLP attorneys and staff will assist the Interim Trustee in this Chapter 7 case:

Thomas W. Waldrep, Jr. (Partner)	\$620 per hour
Jennifer B. Lyday (Partner)	\$400 per hour
Francisco T. Morales (Partner)	\$350 per hour
Anne H. Phillips (Associate)	\$275 per hour
John R. Van Swearingen (Associate)	\$240 per hour
Yazmeen O. Gadalla (Paralegal)	\$190 per hour

Biographical information for each Waldrep LLP attorney and staff member listed above is attached to this Affidavit as Schedule 1 and incorporated herein by reference.

Waldrep LLP agrees to charge, subject to this Court's approval in accordance with Section 330(a) of the Bankruptcy Code, the Firm's standard hourly rates, examples of which are set forth above, plus its customary reimbursements as charged to bankruptcy and non-bankruptcy clients. The rates set forth above are subject to periodic review and adjustment and are set at a level designed to compensate Waldrep LLP fairly for the work of its attorneys and staff. It is the policy of Waldrep LLP also to charge its clients in all areas of practice for all other expenses incurred in connection with the respective client's case. These charges include, among other things, costs for travel, business meals, messengers, couriers, postage, witness fees, and other fees related to hearings and other proceedings which may arise from time to time in the case. Waldrep LLP will charge for these expenses in a manner and at rates consistent with charges made generally to Waldrep LLP's other clients. Waldrep LLP will seek reimbursement of its expenses as allowed pursuant to the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, the Rules of Practice and Procedure of this Court, and Orders of this Court.

No compensation has been received by Waldrep LLP from the Interim Trustee or any other person on said account.

Waldrep LLP has agreed not to (a) share any compensation that it may receive with another party or person other than members of the Firm itself, or (b) share in any compensation that another person or party has received in connection with this case.

Waldrep LLP's Conflict Check System

To the extent that Waldrep LLP is aware of potential parties-in-interest in this case and to the extent that the names of such potential parties-in-interest are clear to Waldrep LLP, Waldrep LLP has cross-checked such names against the names maintained in its conflict database system. Such names are set forth on the attached Schedule 2. Waldrep LLP will use the same procedure to cross-check the names of any additional parties-in-interest of which it becomes aware at a later date, including any such parties-in-interest of which it becomes aware after the Bankruptcy Schedules and Statement of Financial Affairs are filed in this case. Waldrep LLP will supplement this pleading if additional connections become known to the Firm through its conflict check system.

Waldrep LLP maintains and systematically updates its conflict database system in the regular course of business of the Firm, and it is the regular practice of the Firm to make and maintain these records. The Firm's conflict database system is designed to include every matter on which the Firm is or has been engaged, the entity for which the firm is or has been engaged, and, in each instance, the identities of related parties and adverse parties and the name of the attorney in the Firm who is most knowledgeable about the matter. It is the policy of Waldrep LLP that no new matter may be accepted or opened within the Firm without checking the conflict database system for conflicts. Accordingly, the database is updated regularly for every new matter undertaken by Waldrep LLP.

To the best of my knowledge, information, and belief, and based upon the database search described above, the attorneys and staff listed above have not represented in the past, and do not

currently represent, any of the individuals or entities listed on Schedule 2 except as set forth in this Affidavit.

Disinterestedness of Waldrep LLP

Neither I nor any member of my Firm (i) is a creditor, an equity security holder, or an insider of the Debtors, (ii) is or was within the preceding two years a director, officer, or employee of the Debtors, or (iii) has interest materially adverse to the interest of the estate or any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtors, or for any other reason. I believe Waldrep LLP is a “disinterested person” as that term is defined in Bankruptcy Code Section 101(14), as modified by Bankruptcy Code Section 1107(b).

In addition, to the best of my knowledge and based upon the results of the conflicts search described above, other than as described herein, neither I, nor Waldrep LLP, nor any member or associate thereof, holds or represents any interest adverse to the Debtors or their estate.

If any new, material, relevant facts or relationships are discovered or arise, Waldrep LLP promptly will file a supplemental affidavit pursuant to Bankruptcy Rule 2014(a).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 27th day of February, 2019.

/s/ *Thomas W. Waldrep, Jr.*
Thomas W. Waldrep, Jr. (NC State Bar No. 11135)

SCHEDULE 1

Thomas W. Waldrep, Jr. is the managing partner of Waldrep LLP. Prior to starting Waldrep LLP, Tom was a partner in the Winston-Salem, North Carolina office of Womble Carlyle Sandridge & Rice, LLP. Prior to that, Tom was a United States Bankruptcy Judge with the United States Bankruptcy Court for the Middle District of North Carolina for nine years. Prior to his appointment, Tom was a partner at another North Carolina law firm, Bell Davis & Pitt, P.A. Tom has represented secured creditors, Debtors, creditor committees, trade creditors, equity security holders, landlords, purchasers, auctioneers, and other professionals in the bankruptcy arena. He served the North Carolina Bar Association in several different capacities, including as Chair of the Bankruptcy Section and as a member of the Board of Governors. He is a frequent lecturer at continuing legal education seminars and law schools and has published several articles on insolvency issues. Tom received his B.A. in 1979 from Purdue University and his J.D. in 1983 from the Indiana University School of Law, where he served as Managing Editor of the Indiana Law Journal.

Jennifer B. Lyday is a partner at Waldrep LLP. Prior to starting at the firm, she was an associate at Womble Carlyle Sandridge & Rice, LLP, focusing on corporate Chapter 11 representations and related state court Debtors-creditor representations. Jennifer has represented secured creditors, distressed businesses, unsecured creditors' committees, and trustees in business bankruptcy cases. She has also represented buyers and sellers of assets in bankruptcy. Jennifer received her B.A., summa cum laude, in 2006 from Wake Forest University and her J.D. in 2009 from the William & Mary School of Law, where she served as Lead Articles Editor of the William & Mary Law Review.

Francisco T. Morales is a partner at Waldrep LLP. Prior to joining the firm, he was an associate at Womble Carlyle Sandridge & Rice, LLP. Francisco focuses his practice on bankruptcy matters, guiding creditors, Debtors and trustees in both bankruptcy proceedings as well as bankruptcy litigation. Francisco also has experience representing financial institutions in consumer financial services litigation, representing creditors in receiverships and foreclosures, and representing creditors in loan forbearance negotiations and other non-bankruptcy workouts and restructurings. He received his B.A. in 2007 from Davidson College and his J.D. in 2011 from Wake Forest University School of Law.

Anne H. Phillips is an associate at Waldrep LLP. Before Anne joined the firm, she served as a law fellow in the Office of University Counsel at the University of North Carolina at Chapel Hill and in the Office of Legal Affairs at the University of North Carolina System Office. In those roles, she assisted with transactions, regulatory matters, and litigation. She has experience advising clients on a wide variety of matters, including employment law, contract interpretation, statutory and regulatory interpretation, and data privacy law. Anne earned her J.D. in 2014 from the University of Michigan Law School and her B.A. with highest honors and highest distinction in 2007 from the University of North Carolina at Chapel Hill, where she was a Morehead-Cain Scholar.

John R. Van Swearingen is an associate at Waldrep LLP. John obtained a B.A. in Criminal Justice from The Citadel in 2011 and his J.D., *cum laude*, from Wake Forest University School of Law in

2018. At Wake Forest, John served as Notes and Comments Editor for the *Wake Forest Law Review*, Creative and Commentary Editor for the *Wake Forest Journal of Contemporary Bioethics* and was a competing member of the Wake Forest Moot Court Board. During law school, John also interned with United States District Court Judge Richard Voorhees in the Western District of North Carolina and was a summer associate at Waldrep LLP.

Yazmeen O. Gadalla is a paralegal at Waldrep LLP. She graduated *cum laude* from North Carolina State University in 2016. While in college, Yazmeen interned at the United States Attorney's Office for the Eastern District of North Carolina in Raleigh, allowing her to gain valuable legal experience. In 2018, Yazmeen obtained her certification as a North Carolina Certified Paralegal (NCCP). Yazmeen provides essential support to the Firm's healthcare and bankruptcy practices. She regularly assists Firm attorneys with a wide variety of business bankruptcy matters in Chapter 7, Chapter 11, and Chapter 12 proceedings.

SCHEDULE 2

A. Complete Names Cross-Checked Against Waldrep LLP Conflicts Database System

Debra E Ainsley
Mary Angeles
App Group International, LLC
Josie Armstrong
Jessica Barnes
Jolie H Barnes
Karen Bell
Kelsey R Besso
Oscar B Binnicker
Yolanda Bird
Jamie Bland
Kathy Bond-Wardlow
Jennifer Bowen
Rose M Bowser
Sherri Boyd
Javonner S Brown
Barden Browning
Amanda C Bunch
Jennifer Campbell
Jena Cannon
Tiffany C Cheek
Linda Cherry
Reginald C Cole
Satartia Collins
Claytreane C Cooper
Evaline M Davenport
Jamie L Davis
Kelvin T Davis
Carrie N Dickerson-Boyd
Loren B Dormon
Heather Dotson
Wendy F Dunlow
EmpowerHMS LLC
Mary A Furbee
Lisa Gibson
Shannon V Giersdorf
Lari C Hardison
Linda H Harrell
Phyllis D Hines
HPCG Hospital Investment, LLC
Linda P Howlett
Breanna L Hundell

iHealthcare, Inc.
iHealthcare Management Company
iHealthcare Management Company II
Coleen Ireland
Dorothy T Irvin
Wendy D Jackson
Deborah P James
Quenice R Johnson
Kaley Faith Jones
Bethany Kirk
Dysha Knight
Janie R Knight
Lauren C Koehler
Laureen C Koehler
Landmark National Bank
Keyoshia Combs Liverman
Sandra H Lyle
Ashley Manning
Donna O Manseau
Michael B Marks
Dashawn Mason
Jasinski McNeil
Lana B Midgett
Landa B Midgett
Mark D Militana
Gale M Norman
Christina D Ollis
Ronald D Patrick
Ashley Perry
Melanie S Perry
Alma E Phelps
Presley Phelps
Wendy C Phillips
Megan Place
Amber Pope
Janson H Price
Beth Randise
Florence Reber
Mariah Long Riddick
Terry Roberson
Lois J Roberson
Lisa C Rogerson
Ernest L Sanders
Francino Shelton
Joy A Shepard
Siemens Diagnostics Finance Co., LLC

Jacquelyn O Silverthorne
Faithe R Simpson
Cameron Blake Smith
Vanessa Smith
Stacy J Spence
Vanessa Spruill
Chrystie Lee Stowe
Alethea A Stuger
Althea A Stuger
Cathy M Swain
Deborah H Swain
Sheena Y Swain
Denise O Thomas
Robert L Venable
Courtney Marie Ward
Tonita L Weston
Veronica Wilkes
Dawn L Wilson
Krystle C Wyly
David L Wynn

B. Incomplete Names Cross-Checked Against Waldrep LLP Conflicts Database System to the Extent Feasible

2012 WASHINGTO
3M
AB SCIEX LLC
ABBOTT-LABORAT
ADAPTIVE MEDIC
ADVANTAGE RN,
AGEMA LAB MANA
AGILITY HEALTH
AIRGAS
AIRGAS USA, LL
ALBEMARLE HOSP
ALBEMARLE ORTH
ALERE, NORTH A
ALIMED
ALLIANCE HEALT
ALLSCRIPTS HEA
AMAZON CAPITAL
AMBU
AMERICAN PROFI
AMERICAN RED C

AMERISOURCE BE
ARMSTRONG MEDI
ARROW INTERNAT
ASPIRAR MEDICA
ATLANTIC BIOLO
ATLANTIC COAST
ATLAS MEDSTAFF
B BRAUN MEDICA
BAKER-ALLEN BU
BARD ACCESS SY
BAXTER HEALTHC
BAYER CORPORAT
BEAUFORT HOSPI
BECKMAN COULTE
BEMES, INC
BIOMERIEUX INC
BKD, LLP
BOSTON SCIENTI
BOWEN HEATING
BRAEMAR INC
BRAME SPECIALT
BRIGGS
BUTLER & ASSOC
C&R MEDICAL
CAPITAL INVENT
CARDINAL HEALT
CAREEXPAND, LL
CAREFUSION
CAREFUSION 220
CAREFUSION SOL
CARESTREAM HEA
CARRIER CORPOR
CARSTENS
CASTLE MEDICAL
CENTIMARK CORP
CENTRAL CAROLI
CENTURYLINK
CHEMTREAT INC
CHOWAN HOSPITA
CHRISTOPHER M
CITIZENS BANK

CLINICAL CODIN
COASTAL RADIOL
COECO FINANCIA
COLLEGE OF AME
COMPLIANT HEAL
CONMED/LINVATE
COOKE COMMUNIC
CPSI
CR BARD INC
CREEK RIDGE CAP
CUMMINS ATLANT
DELTA FLEX TRA
DEPARTMENT OF
DEX
DIAMOND POWER
DIGITEC MEDICA
DNV GL HEALTHC
DOMINION NORTH
DURLYN BROADCA
EAST CAROLINA
EASTERN AHEC
EASTERN RADIOL
EC ORTHOTICS &
ECOLAB
ED ROBERSON
EMDEON BUSINES
EMERGENCY STAF
EPOWERDOC INC
ER IMAGING, IN
ERx, LLC
EVOQUA WATER T
Experian Healt
FDS-MQSA PROGR
FEDEX
FIRST ADVANTAG
FIRST REPORT S
FISHER HEALTHC
FLEETWOOD FINA
FRANCES ELIZAB
FRIDAY CENTER
GE HEALTHCARE

GE MEDICAL SYS
GNEIL
GRAINGER
GRAYWATER TRAD
GREENVILLE PAT
GRX INVENTORY
HAGAN BARRETT
HALIFAX LINEN
Hardy Diagnost
HEALTH CARE LO
HEALTHCARE LOG
HEMOCUE INC
HOLLISTER INCO
HOLT EQUIPMENT
HORIZON CSA, L
HUMAN ARC
HUSCH BLACKWEL
I-70 COMMUNITY
IBM CORPORATIO
IMMUCOR INC
IMPACT NETWORK
INDEPENDENT MA
INDEPENDENT RE
INHEALTH PROFE
INTERMED BIOME
INTERMED NUC M
INTERMED X-RAY
J & J HEALTH C
JACKSON PHARMA
JOE MOORE & CO
JOHN M. LANGE
JOHNSON CONTRO
KATHY COOK
KCI
KENNETH E. BAR
KINA COLLIER
KPS PHYSICIAN
LABORATORY STA
LABSCO
LANDAUER INC
LANDMARK NTL B

LANGUAGE LINE
LGMG, LLC
LIQUIDAGENTS H
LRS HEALTHCARE
MAILFINANCE
MARKETLAB INC
MARTIN GENERAL
MASIMO
MAXIM HEALTHCA
MCKESSON MEDIC
MCKESSON PHARM
MCNAIR OIL CO
MCNEARY INC
MEDIACOM
MEDIACOM MID-A
MEDIBADGE
MEDICAL ARTS P
MEDLINE INDUST
MEDPRIME CAPIT
MEDRAD
MEDTOX LABORAT
MEDTRONIC PHYS
MELANIE A PERR
MERCURY MEDICA
MERRITT HAWKIN
MERRY X-RAY CO
MESIROW INSURA
METROPOLITAN M
MHA
MANAGEMENT
MILLIPORE
MINDRAY DS USA
MISSOURI NETWO
MONEYSWORTH LI
MOORE MEDICAL
MYUNG-KIL JEON
NATIONAL ORGAN
NATIONAL STAFF
NC CHILD SUPPO
NC DEPARTMENT
NC DEPT OF MOT

NC DEPT OF REV
NC DEPT OF REV
NC DHHS FEES P
NCDHSS
NCHA
OCCUPATIONAL H
OFFICE DEPOT,
OFFICE OF CME
OFFICEZILLA, L
OIG CMP STLMT
OLYMPUS AMERIC
OLYMPUS FINANC
ORTHO CLINICAL
OWENS & MINOR
PACIFIC MEDICA
PATIENT TELEPH
PATTERSON MEDI
PC CONNECTION
PC MALL SALES
PERSONNEL CONC
PHILIPS MEDICA
PHILLIP MCNAIR
PITT COUTY MEM
PLATINUM CODE
POSTMASTER
PRECISION DYNA
PRN FUNDING, L
PRO-MED EQUIPM
PROPHYSICS
QCR HOLDINGS I
QUEST DIAGNOST
QUILL CORPORAT
RAMP PLYMOUTH,
READYLINK
REBOOT INC
RHODES ELECTRI
RICHARD M STEA
ROANOKE THERAP
ROBBIE BARBER
ROCHE DIAGNOST
ROLLINS, INC.

RR DONNELLEY
SCHNEIDER ELEC
SCOUT HEALTH L
SENTRY EXTERMI
SHI
SIEMENS HEALTH
SIMPLEX-GRINNE
SKILLPATH SEMI
SMITHS ADDRESS
SOCIETY FOR HU
SOFTSCRIPT
SOFTSCRIPT, IN
SOUTHERN MICRO
SOVEREIGN MEDI
SPECIALTY SURG
SPIRIT STOP
STALLARD TECHN
STAPLES BUSINE
STERICYCLE INC
STERICYCLE, IN
STERILELINK, I
STERIS CORPORA
STRYKER MEDICA
SUPER SHRED
SUTTON & CHURC
SYSCO FOOD SER
SYSMEX AMERICA
THE MORGAN LEN
THE NATIONAL A
THE RUHOF CORP
THE ST JOHN CO
THREATTRACK SE
TINA ELAM
TIRUPATTUR, PR
TMS AUDIO PROD
TOSHIBA AMERIC
TOWN OF PLYMOU
TRIANGLE XRAY
TRI-ANIM HEALT
TRI-COUNTY TEL
TRICOUNTY TELE

TRUSTAFF
TRUVEN HEALTH
TX CHILD SUPPO
UNITED DRUG SU
UNIVERSAL HOSP
UNIVERSITY OF
UPS
US POSTAL SERV
US TRUSTEE PAY
VENABLE, ROBER
VIDANT PUNGO H
VITAL SIGNS, I
WASHINGTON CO
WASHINGTON COU
WASHINGTON NEW
WASTE INDUSTRI
WELCH ALLYN IN
WENDY JACKSON
WESTERN HEALTH
WHITE OAK MEDI
WILLIAMS FIRE
WILLIAMSTON FI
WILLIAMSTON HO
WISCONSIN PHYS
WOLTERS KLUWER
YADKIN VALLEY
ZOLL MEDICAL C

**UNITED STATES BANKRUPTCY COURT
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IN RE:)
) Case No. 19-00730-5-JNC
CAH ACQUISITION COMPANY #1, LLC d/b/a)
WASHINGTON COUNTY HOSPITAL,) Chapter 7
)
Debtor.)
)

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **MOTION TO EMPLOY WALDREP LLP AS COUNSEL FOR INTERIM TRUSTEE** was filed electronically in accordance with the local rules and was served upon those listed in Exhibit B on the date set forth by first class mail or by electronic service through CM/ECF.

Dated: February 27, 2019.

WALDREP LLP

/s/ Thomas W. Waldrep, Jr.
Thomas W. Waldrep, Jr. (NC State Bar No. 11135)
Jennifer B. Lyday (NC State Bar No. 39871)
Francisco T. Morales (N.C. State Bar No. 43079)
Anne H. Phillips (NC State Bar No. 48760)
John R. Van Swearingen (NC State Bar No. 53646)
101 S. Stratford Road, Suite 210
Winston-Salem, NC 27104
Telephone: 336-717-1440
Telefax: 336-717-1340
Email: notice@waldrepllp.com

Proposed Attorneys for the Interim Trustee

EXHIBIT B

VIA CM/ECF / E-MAIL		
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